

FILED

April 02, 2025

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: DT
Deputy

UNITED STATES OF AMERICA,**Plaintiff,****v.**

**(1) JEAN CARLOS CHAVEZ
GUTIERREZ,
(2) LUIS RAMON BATISTA ROMERO,
(3) LUIS DANIEL CASTILLO
PEROZO, and
(4) BRUNO EMILIO CASTILLO
COLMENAREZ,**

Defendants.**Case No: EP:25-CR-00652-LS****INDICTMENT**

CT 1: 18 U.S.C. § 111(a)(1) – Assaulting,
Resisting, or Impeding Certain Officers or
Employees Causing Physical Contact

CTS 2-4: 18 U.S.C. § 111(a)(1) – Assaulting,
Resisting, or Impeding Certain Officers or
Employees

THE GRAND JURY CHARGES:

COUNT ONE

On or about February 5, 2025, in the Western District of Texas, Defendant,

(1) JEAN CARLOS CHAVEZ GUTIERREZ,

intentionally, forcibly assaulted, resisted, opposed, impeded, intimidated, and interfered with A.V.,
a person designated in 18 U.S.C. § 1114, to wit: kicking the body of and causing physical contact
with A.V., an ICE Contract Detention Officer who was engaged in official duties, in violation of
Title 18, United States Code, Section 111(a)(1).

COUNT TWO

On or about February 5, 2025, in the Western District of Texas, Defendant,

(2) LUIS RAMON BATISTA ROMERO,

intentionally, forcibly assaulted, resisted, opposed, impeded, intimidated, interfered with, a person designated in Title 18, United States Code, Section 1114, that is, A.V., an ICE Contract Detention Officer, in violation of Title 18, United States Code, Section 111(a)(1).

COUNT THREE

On or about February 5, 2025, in the Western District of Texas, Defendant,

(3) LUIS DANIEL CASTILLO PEROZO,

intentionally, forcibly assaulted, resisted, opposed, impeded, intimidated, interfered with, a person designated in Title 18, United States Code, Section 1114, that is, H.M., an ICE Contract Detention Officer, in violation of Title 18, United States Code, Section 111(a)(1).

COUNT FOUR

On or about February 5, 2025, in the Western District of Texas, Defendant,

(4) BRUNO EMILIO CASTILLO COLMENAREZ,

intentionally, forcibly assaulted, resisted, opposed, impeded, intimidated, interfered with, a person designated in Title 18, United States Code, Section 1114, that is, U.M., an ICE Contract Detention Officer, in violation of Title 18, United States Code, Section 111(a)(1).

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

MARGARET F. LEACHMAN
ACTING UNITED STATES ATTORNEY

BY: *José Luis González*
Assistant U.S. Attorney